

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

|                                    |   |                      |
|------------------------------------|---|----------------------|
| In the Matter of                   | ) |                      |
|                                    | ) |                      |
| Modernizing the E-rate Program for | ) | WC Docket No. 13-184 |
| Schools and Libraries              | ) |                      |

**REPLY COMMENTS OF THE NATIONAL ASSOCIATION OF  
TELECOMMUNICATIONS OFFICERS AND ADVISORS**

The National Association of Telecommunications Officers and Advisors (“NATOA”)<sup>1</sup> submits these reply comments in response to the Notice of Proposed Rulemaking (“NPRM”), released July 23, 2013, in the above-entitled proceeding.

The E-rate program is at a critical juncture – the FCC can continue to take reformative steps that will ensure connectivity to every classroom and every device, or it can buckle under to pressure exerted by some entrenched service providers to limit deployment and service options.

We wholeheartedly agree with the proposition that one technology platform will not meet the needs of every school and library in the country. Indeed, flexibility is the key and each institution must be able to opt for the technology that works best for that location. For some, the use of dark fiber or building out a new network to serve schools and libraries are simply two

---

<sup>1</sup> NATOA is a national trade association that promotes local government interests in communications, and serves as a resource for local officials as they seek to promote communications infrastructure development.

options we believe should be on the table when local officials make their decisions on how to best provide high-capacity broadband to these vital anchor institutions in their communities.

As we have stated before, neither of these options may be feasible in a particular community for a variety of reasons, both economically and politically. But schools and libraries should have available to them the full arsenal of deployment options in order to select the best broadband service that meets their unique needs.<sup>2</sup>

Some have argued that permitting E-rate funds to be used to light dark fiber or build new fiber networks to schools and libraries would create “islands of connectivity in a sea of inadequate broadband.”<sup>3</sup> We agree. These “seas of inadequate broadband” have been created by private providers who, for whatever reasons, cannot or will not provide high-capacity broadband to every community in our nation. E-rate funds have the real potential to create these so-called “islands of connectivity” so that our children can have access to the incredible benefits that Internet services can bring to their lives. Residents who lack connectivity at home can avail themselves of high-speed services at their local libraries. Some schools and libraries might even work to expand the availability of these services through community hotspots. Rather than be derided, these “islands of connectivity” should be celebrated as a first step in bringing high-capacity, high-speed Internet to communities that currently lack such services. To claim that these networks or lighting dark fiber would impair the build-out of more “robust” community-wide networks is disingenuous and simply wrong. Frankly, “islands of connectivity” would

---

<sup>2</sup> For example, we agree with comments filed by the Schools, Health & Libraries Broadband (SHLB) Coalition that “managed wireless services,” including the use of unlicensed spectrum (Wi-Fi), should be treated as a Priority 1 service in order to provide schools and libraries with an additional connectivity option.

<sup>3</sup> Hultquist, H. “Institutions or a Digital Bridge to Nowhere?” Retrieved November 7, 2013, from <http://www.attpublicpolicy.com/universal-service/anchor-institutions-or-a-digital-bridge-to-nowhere/>.

provide some badly needed refuge from the “sea of inadequate broadband” until private providers step forward to start providing the Internet services our communities need to compete economically, socially, and politically.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. Traylor".

Stephen Traylor  
Executive Director/General Counsel  
NATOA  
3213 Duke Street, #695  
Alexandria, VA 22314  
703-519-8035  
November 8, 2013